



December 19, 2000

Utah Coal Program
Utah Division of Oil, Gas, and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Attn: Pam Grubaugh-Littig

**Re: Extension Request for Responding to Deficiencies of the Technical Analysis and Findings
Dated November 15, 2000, PacifiCorp, Deer Creek Mine, C-18-RN00, Emery County,
Utah.**

PacifiCorp, by and through its wholly-owned subsidiary, Energy West Mining Company ("Energy West") as mine operator, hereby submits a request to extend the time limit for responding to the deficiencies of the Deer Creek permit renewal. These deficiencies include the legal information concerning the shift in the corporate structure since the merger with Scottish Power in November, 1999.

The legal fact finding venture is taking longer than anticipated as we must coordinate our activities between the corporate offices in Portland and Salt Lake City, as well as the Energy West office in Huntington. Since the merger between the two corporations, transition has brought many changes at the executive level. The structure of the corporation has changed and must be thoroughly research to completely outline this new structure and incorporate it into the MRP. It is the intent not only to supply the Division with the most current and factual legal information, but also make the information useful for all PacifiCorp mining subsidiaries. This information will be placed into all Energy West mining permits as soon as possible.

To date, PacifiCorp has acquired a rider bond in the amount of \$3,000,000 to cover the proposed escalated reclamation bond amount for the Deer Creek Mine (refer to letter from Scott Child dated December 12, 2000). Research has also been completed which involved stating the legal descriptions of the surface and subsurface owners, right of entry, and permit area for the Deer Creek Mine. To fit this new information into the permit, the legal and financial sections of the permit (Chapter 1, Deer Creek MRP) must be rewritten to comply with the R645 Utah Coal Regulations. Therefore, a 30 day extension is being requested to complete this task.

If the Division has any questions or concerns involving this extension request, please feel free to contact me at (435) 687-4720 or Dennis Oakley at (435) 687-4825.

Sincerely,

Dennis Oakley
for Chuck Semborski
Geology/Permitting Supervisor

DCO/cas

cc Carl Pollastro (EWMC)
Scott Child (IMC)

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**DIVISION OF
OIL, GAS AND MINING**

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